

**AMENDMENT TO THE DRAWINGS:**

The attached sheet of drawings includes changes to Figs. 1 and 2, and replaces the original sheet including Figs. 1 and 2.

Fig. 1 – insert reference planes P1, P2

Fig. 2 – insert reference planes P1, P2

Attachment: Replacement Sheet (Figs. 1-2)

## REMARKS

Reconsideration of the present application is requested.

The present invention relates to a reinforcement ply for a tire, the reinforcement ply formed of reinforcement elements embedded in respective coatings, characterized in that the ply comprises first  $C_1$  and second  $C_2$  layers of metallic elements  $E_1$ ,  $E_2$  parallel to one another and embedded in a coating  $M_1$ ,  $M_2$ . Radially between the two layers  $C_1$  and  $C_2$ , is a third layer  $C_3$  of elements  $E_3$  made from a textile material embedded in a third coating  $M_3$ , the textile elements  $E_3$  being orientated relative to the metallic elements  $E_1$  and  $E_2$  at an angle between  $70^\circ$  and  $110^\circ$ .

In the embodiment disclosed in connection with Fig. 2, the coating  $M_3$  of the third layer  $C_3$  makes direct contact with the metallic elements  $E_1$ ,  $E_2$  of the first and second layers, whereby that coating  $M_3$  serves to embed portions of those metallic elements  $E_1$ ,  $E_2$ . Consequently, it is apparent that the third layer  $C_3$  must be at least of equal width as the first and second layers. That is, the third layer cannot be of less width than the first and second layers, as now recited in claim 1. In contrast, the middle layer 31 of Fig. 4 of the Mirtain patent is required to be of less width than the first and second layers (see Mirtain, column 3, lines 20-25). Accordingly, claim 1 distinguishes over Mirtain.

Moreover, each of the metallic elements of the first layer in the presently claimed invention lies in a respective radial plane  $P_1$  (see the accompanying replacement sheet) and is always disposed radially outwardly of the third layer in such radial plane. Likewise, each metallic element  $E_2$  of the second layer lies in a respective radial plane  $P_2$  and is always disposed radially inwardly of the third layer

in such radial plane. In contrast, each of the Verbauwheide et al. and Witt et al. patents discloses a braided arrangement wherein the warp and weft elements are woven with respect to one another. Thus, each metal element of the first layer lies in a radial plane, but is woven with respect to the metal elements of the third layer, so sometimes each wire element of the first layer lies radially inwardly of the third layer (as seen in such radial plane). The same is true of the wire elements of the second layer, i.e., sometimes each wire element of the second layer lies radially outwardly of the third layer (as seen in the radial plane of the wire element).

The same is true of the arrangement in Witt et al. which also discloses a braided structure.

Accordingly, it is submitted that claim 1 distinguishes over Verbauwheide et al. and Witt et al.

As regards Kabe, that patent discloses a crown reinforcement of a tire in which the radially internal crown ply is formed of three layers, comprising a textile layer 7 axially sandwiched between two metallic layers 2a (left and right positions); see for example Fig. 1, column 2, lines 18-25. In contrast, present claim 1 recites that the third layer is disposed radially between the first and second layers.

Accordingly, it is submitted that claim 1 distinguishes over Kabe.

In light of the foregoing, it is submitted that claim 1 distinguishes patentably over the applied prior art. The subject matter of new dependent claims 8 and 9 is not disclosed by the applied prior art references.

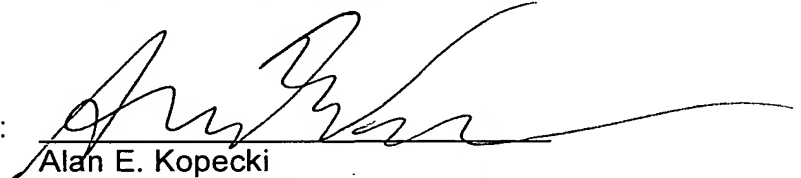
It is submitted that the application is in condition for allowance and such allowance is respectfully solicited.

Respectfully submitted,

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